

Harbor Comments@EPA.gov

At the urging of our colleagues, neighbors and family, and on behalf of the community who the Portland Harbor Community Advisory Group has communicated, involved and reached out to, we express the following opinion on the Explanation of Significant Differences for Benzo(a)pyrene statement made by the U. S. Environmental Protection Agency.

1 Introduction

In 2017, the EPA presented the ***Record of Decision*** where it sets forth EPA's selected remedy for a site and the reasons for its selection.

There are several problems associated with the Explanation of Significant Differences. Initially, the Record of Decision proposed dredging because it is the greatest contribution to the reduction of contamination in the Superfund site. To reduce the dredging means a reduction of protectiveness.

To propose that Benzo(a)pyrene can be separated from the other cancer causing PAH's is not scientifically established. Also, the combinations of PAH's found in the GASCO-Northwest Natural site can be viewed as synergistically more toxic. Those combinations or their effects have not been analyzed scientifically.

Furthermore, the ESD:

- Does not address non-cancer issues such as endocrine disrupters which affects the reproductive system and therefore future generations
- Does not remove all cancerous possibilities; Benzo(a)pyrene individually still causes cancer
- Affects more than dock workers; recreational boaters, swimmers, children and adults playing on the beach
- Forced the issue before the five-year review as stated in the ROD; the ROD represents the choice of the public as expressed by 5300 comment cards from those who legally possess the Willamette River as in the law of "public domain."

- The reason the five-year review was included in the ROD so that continual and repeated changes with toxicity screening levels would not be used as delay tactics; cause incessant changes to stop the Superfund and interfere with proper legal process. With 68 chemicals as COC's analyzed and causing daily problems, if every time there was a perceived change in these chemicals (COC's) toxicity to change the Superfund cleanup process; the process would be recurrent delays and go on infinitely.

Respectfully,

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Portland Harbor
Community Advisory Group